

Exhibit M



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July 17, 2015

**VIA FEDEX
AND EMAIL (without encls.)**

Gregory K. McGillivray, Esq.
Woodley & McGillivray
1101 Vermont Avenue, N.W.
Suite 1000
Washington, D.C. 20005

Re: Keisha Foster et. al. v. City of New York, New York
14-cv-4142(PGG)

Dear Greg:

We are writing in response to your letter dated July 8, 2015 and in furtherance of our "meet and confer" conference call on July 13, 2015 wherein the parties discussed outstanding discovery issues.

Enclosed please find a disk with Defendant's supplement production of documents to Defendant's Responses and Objections to Plaintiffs' First Request for the Production of Documents bearing bates numbers D001709-D001781. These documents supplement Defendant's productions on December 23, 2014 (D000001-D000080) and April 22, 2015 (D000081-D000291) as well as Defendant's production of Phase One Plaintiff's documents (D000292-D001708) pursuant to Joint Stipulation for Phase One Discovery on June 15, 2015.

Accordingly, subject to and without waiving Defendant's objections as set forth in Defendant's Responses and Objections to Plaintiffs' First Request for the Production of Documents, Defendant has produced the following documents responsive to Plaintiffs' Requests. These general documents (D000001-D000291; D001709-D001781) are in addition to the individual Phase One Documents (D000292-D001708) which at times are also generally responsive to many of Plaintiffs' Requests.

Request No. 2	D000001-D000291; D001709-D001781
Request No. 3	D000081-D000291
Request No. 4	D000001-D000080
Request No. 5	D000001-D000080; D000246-D000291

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Request No. 7	D000081-D000245
Request No. 10	D000083-D000251; D000253-D000291; D001721-D001781
Request No. 11	D000236-D000249; D000253-D000291; D001721-D001781
Request No. 12	D000236-D000249; D000253-D000291; D001721-D001781
Request No. 14	D000081-D000249
Request No. 15	D000081-D000249; D000253-D000291; D001721-D001781
Request No. 16	D000081-D000249; D000253-D000291; D001721-D001781
Request No. 17	D000081-D000249; D000253-D000291; D001721-D001781
Request No. 19	D000087-D000249; D000253-D000291; D001721-D001781
Request No. 20	D000087-D000249; D000253-D000291; D001721-D001781
Request No. 23	D000246-D000249; D000253-D000291; D001721-D001781
Request No. 24	D000083-D000249; D000253-D000291; D001721-D001781
Request No. 27	D000246-D000249; D000253-D000291; D001721-D001781
Request No. 28	<u>See generally</u> Defendant's entire production
Request No. 29	<u>See generally</u> Defendant's entire production.

Also enclosed on the disk is a complete PMS Salary Parameter file.

Very truly yours,

JACKSON LEWIS P.C.

Felice B. Ekelman

cc: Hope Pordy, Esq. (Via Email)
 Andrea O'Connor, Esq. (Via Email)
 Steven J. Seidenfeld, Esq. (FIRM)
 Sarah K. Hook, Esq. (FIRM)